



ECS CAROLINAS, LLP

Geotechnical • Construction Materials • Environmental • Facilities

"Setting the Standard for Service"

NC Registered Engineering Firm F-1078

February 14, 2012

Mr. P. Sean Boyles, P.G.
NCDENR-Division of Waste Management
Inactive Hazardous Sites Branch
225 Green Street, Suite 714
Fayetteville, North Carolina 28305

RECEIVED

FEB 17 2012

DENR-FAYETTEVILLE REGIONAL OFFICE

Reference: Evaluation of Chlorinated Solvent Sources
Sale Ford Site
1145 Hwy 258 North
Kinston, Lenoir County, North Carolina
ECS Project No. 22-17225

Dear Mr. Boyles:

ECS Carolinas, LLP (ECS) is pleased to provide the following update in regard to the above referenced project. Mr. Daniel Sale/Sale Ford has requested that we notify the Branch of the actions that have been initiated, and additional actions that will be implemented to voluntarily comply with the requirements set forth in the Notice received earlier by the facility.

To determine if active or inactive sources of chlorinated solvents are present at the site, ECS conducted inquiry with personnel of the facility knowledgeable of previous and current operations specific to tetrachloroethene (PCE). A previous sampling event conducted in September 2011 by Terracon, presumably shows groundwater samples in two locations, GW-2 and GW-5, exhibiting violations of NCDENR, Title 15A, NCAC, Subchapter 2L, Groundwater Quality Standards. ECS assumes that the sample results provided by Terracon are valid and representative of groundwater conditions at the time of sampling. Due to the limited number of samples collected by Terracon during their investigation, no inference could be derived concerning the spatial magnitude of groundwater impacts. In the GW-2 location identified in the previous investigation, it is suspected that the groundwater sample with a PCE concentration of 13.8 ug/L is associated with the operation of a former waste-oil underground storage tank (UST) that was removed from that location over 18 years ago by the former owner of the property. The UST was owned and operated by Mr. Herman Harper, former owner of the site. The UST was reported to have been used to store used-oil products generated by Mr. Harper's operation until the tank was removed in the 1993 timeframe. The property was not acquired by Mr. David Sale (father of Dan Sale) until December of 2003. Prior to purchasing the property, due diligence was performed by Mr. Sale to determine environmental conditions on the site. No indication of a release of PCE was noted at the time of Mr. Sales purchase in 2003.

Since purchasing the site in 2003, the facility reports it has never used, stored, disposed, treated or otherwise handled PCE or other chlorinated solvents on the property. The facility only uses limited quantities of "Natural Orange" and "Purple Power", biodegradable detergents and cleaners. All waste products from the spent biodegradable cleaners mentioned are managed by collection and disposal using Noble Oil Services of Raleigh, NC. Since the facility has not historically used or handled chlorinated solvents on the site since taking ownership in 2003, no active or inactive

sources of chlorinated solvents have been identified. Adjacent to the area of GW-5 where a second groundwater sample exhibited a minor concentration of PCE in groundwater (1.1 ug/L), nearby overlying contaminated soil was excavated by Terracon and disposed. It is suspected that surface spillage in to soils may have occurred in that area due to parts cleaners that may have been used during the time the former autobody repair shop operated in the building. Again, in this area no present sources have been identified or are known to be contributing to the groundwater impacts discovered by the Terracon assessment. Removal and disposal of the contaminated soil identified in that area is considered to be an appropriate initial abatement action since no information has been disclosed to show the use, storage, or handling of chlorinated sources or parent products at the site since 2003.

Additional Proposed Actions

Two additional tasks are proposed to further assess groundwater conditions at the site and determine if potential adjacent or nearby receptors may exist. The proposed tasks are summarized below:

Task 1- Potential Receptor Survey

ECS will conduct a potential receptor survey to determine if adjacent or nearby sensitive receptors are located within a 1,000 liner foot radius of the site. The survey will include identification of potable and non-potable water wells, surface waters, streams or watercourses, subsurface features, groundwater well protection areas, groundwater recharge areas, or other receptors that could potentially be adversely affected by impacted groundwaters from the site. The findings of the survey identifying potential receptors will be summarized in a Potential Receptor Survey Report.

Task-2- Limited Groundwater Assessment

In the vicinity of former GW-2 and GW-5 sample locations, ECS proposes additional groundwater sampling. At each of these locations, three additional Geoprobe® borings will be advanced (total of six borings) to an anticipated depth of 18 to 20 feet below ground surface. The Geoprobe® borings will be advanced to encounter saturated groundwater conditions. Temporary monitoring wells or a patented Geoprobe® Insitu-Downhole Sampler will be used to collect representative groundwater samples for PCE. At the time of the September 2011 Terracon assessment, groundwater was encountered at 16 feet below existing grade, however groundwater is anticipated to be deeper now due to recent drought conditions. The three borings proposed in each location will be positioned approximately 15 feet outward from the former groundwater sample locations conducted by Terracon and will triangulate the location of the previous sampling points. In the former GW-5 sample location, the three proposed borings will be drilled through

Evaluation of Chlorinated Solvent Sources

Sale Ford

1145 Hwy 258 North

Kinston, North Carolina

ECS Project No. 22-17225

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the concrete floor slab inside of the northeast end of the existing shop building and adjacent to a hydraulic lift. The three borings proposed in the vicinity of the former GW-3 sample location (southeast end of shop building) will be drilled outside of the shop building through asphalt surfacing that presently covers the closed tank pit where the former waste-oil UST was reported to have been located. Groundwater samples will be analyzed using SW-846, EPA Method 8260. The proposed groundwater samples that will be collected from each location will allow us to 1) confirm present groundwater conditions in each location and 2) make general inferences about the presence/horizontal extent of groundwater contamination in each location.

Upon receipt of analytical results from Task 2, ECS will prepare a brief report containing the findings of the Limited Site Assessment. The report will summarize field methods, sample locations and depths, and laboratory analytical results of the samples collected. It is anticipated that the field work, laboratory analysis, and report preparation will require 45 days to complete. A copy of the report will be forwarded to NCDENR-Inactive Hazardous Sites Branch.

If you have any questions in the interim or wish to discuss the proposed scope of work further, please feel free to contact us at (910)-686-9114.

Sincerely,

ECS CAROLINAS, LLP



Rudy A. Smithwick, P.G.
Senior Geologist



John Stewart, P.G./RSM
Principal Geologist

CC: Mr. Daniel K. Sale ✓



ECS CAROLINAS, LLP

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NC Registered Engineering Firm F-1078

November 10, 2011

Mr. P. Sean Boyles, P.G.
NCDENR-Division of Waste Management
Inactive Hazardous Sites Branch
225 Green Street, Suite 714
Fayetteville, North Carolina 28305

Reference: Regulatory Requirements for Contaminant Assessment and Cleanup
Sale Ford Site
1145 Hwy 258 North
Kinston, Lenoir County, North Carolina
ECS Project No. 22-17225 *NONCD0002886*

Dear Mr. Boyles:

With this correspondence, ECS Carolinas, LLP (ECS) is pleased to inform you that we have been retained by Mr. Daniel Sale/Sale Ford to assist with addressing the regulatory requirements as referenced above. In accordance with the October 13, 2011 Notice, we are notifying the Branch of the actions that have been (or will be) initiated on behalf of Mr. Sale to voluntarily comply with the requirements set forth in the Notice.

On October 25, 2011 ECS personnel conducted a site reconnaissance to evaluate the conditions of the site and the findings contained in the "Limited Site Investigation and Soil Excavation Report" (LSI) dated September 23, 2011 performed by Terracon. The LSI report concluded that ground water in the vicinity of GW-2 and GW-5 has been impacted by tetrachloroethylene (PCE) above limits defined by NCAC, Title 15A, Subchapter 2L, "Groundwater Quality Standards" (2L). Through inquiry with personnel at the facility knowledgeable of previous and current operations and observations during our site reconnaissance, no apparent ongoing processes or sources of chlorinated hydrocarbons (specifically PCE) were observed being stored, used, handled or discharged in the vicinity of the GW-2 and GW-5 locations. It is suspected that the groundwater impacts discovered in the vicinity of GW-2 may be related to a former used-oil underground storage tank (UST) that was previously removed from that area. In the vicinity of GW-5, where contaminated soil was excavated by Terracon, it is suspected that surface spillage or de minimus spillage of parts cleaners may have occurred in that location at the time that the former autobody repair shop operated in the building.

The above described activities are reported to have been conducted by the previous site owner prior to Mr. Sales acquisition of the property. As such, there have been no known active sources of solvents, particularly PCE, identified by ECS that may be contributing to the groundwater impacts discovered by the Terracon assessment. Therefore, no initial abatement actions appear warranted at this time in the absence of use, storage, or handling of source or parent products.

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DIVISION OF WASTE MANAGEMENT
FAYETTEVILLE REGIONAL OFFICE

Notice of Regulatory Requirements for Contaminant Assessment and Cleanup
Sale Ford
1145 Hwy 258 North
Kinston, North Carolina
ECS Project No. 22-0000
Page 2 of 2

We will continue evaluating the conditions and cause for the apparent groundwater impacts in the location of GW-2 and GW-5 and will advise the Branch of the forthcoming findings.

If you have any questions in the interim or wish to discuss the project further, please feel free to contact us at (910)-686-9114.

Sincerely,

ECS CAROLINAS, LLP



Rudy A. Smithwick, P.G.
Senior Geologist



John Stewart, P.G./RSM
Principal Geologist

CC: Mr. Daniel K. Sale



North Carolina Department of Environment and Natural Resources

Dexter R. Matthews, Director

Division of Waste Management

Michael F. Easley, Governor
William G. Ross Jr., Secretary

October 13, 2011

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Daniel K. Sale
1145 HIGHWAY 258 NORTH
KINSTON NC 28504

**Re: NOTICE OF REGULATORY REQUIREMENTS FOR CONTAMINANT ASSESSMENT
AND CLEANUP**

Sale Ford, 1145 Highway 258 NORTH, Kinston, Lenoir County, NC 28504

Dear Mr. Sale:

This office was recently notified by the Division of Waste Management's Underground Storage Tank (UST) Section of chlorinated solvent contamination discovered during a recent investigation of a petroleum release at the above referenced facility. Specifically tetrachloroethylene (PCE) as high as 13 micrograms/liter (ug/L) was detected in the groundwater, which exceeds the State's Groundwater Quality Standard (Title 15A NCAC 2L .202) for this compound. PCE is not component of petroleum but may be associated with automotive repair work such as in metal cleaning or as degreasing agent. Regulatory oversight for the assessment and cleanup under all applicable authorities will be provided by the Division of Waste Management through its Superfund Section, Inactive Hazardous Sites Branch ("Branch").

Based on information provided to date, the Inactive Hazardous Sites Response Act ("IHSRA"), codified under N.C. Gen. Stat. § 130A-310, et seq., applies to your site. In addition, initial immediate actions may be required under 15A NCAC 2L, Groundwater Classifications and Standards.

I. ACTIONS REQUIRED AT THIS TIME:

Take Initial Abatement Actions Required Under 15A NCAC 2L.

If you have not already done so, you must take the initial abatement actions required under 15A NCAC 2L. Pursuant to 15A NCAC 2L .0106(b), any person conducting or controlling an activity which results in the discharge of a waste or hazardous substance to the groundwaters of the State, or in proximity thereto, shall take immediate action to terminate and control the discharge, and mitigate any hazards resulting from exposure to the pollutants. Pursuant to 15A NCAC 2L .0106(c), if groundwater standards have been exceeded, you must take immediate action to eliminate the source or sources of

contamination. Beyond initial abatement actions, all assessment and remediation will be done through the IHSRA.

Note also that, properties with volatile organic contaminants in soil or groundwater have the potential for vapors to enter homes and other buildings on or near the property. It is the responsibility of any party who meets the definition of responsible party under the IHSRA or 15A NCAC 2L to take proper action to assess and mitigate these threats.

II. FUTURE ASSESSMENT AND CLEANUP ACTIVITIES:

All correspondence regarding this site should be sent to the Branch. Future assessment and cleanup activities (activities conducted after the initial abatement steps required in 15A NCAC 2L) may be conducted through the Voluntary Cleanup Program (discussed below) or pursuant to an Order issued under N.C. Gen. Stat. § 130A-310.3. In addition, if you choose not to conduct a cleanup through the Voluntary Cleanup Program, the site may be referred to the United States Environmental Protection Agency ("EPA"). If so referred, EPA will screen the site for Federal enforcement action under the Federal Superfund Program, established under the Comprehensive Environmental Responsibility, Compensation, and Liability Act ("CERCLA").

III. VOLUNTARY CLEANUP PROGRAM:

Under the IHSRA, persons who move forward to assess and remediate contamination, without being compelled to do so through formal legal action filed against them, are called "volunteers." To participate in the voluntary cleanup program, you will be required to enter into an administrative agreement with the Branch. The voluntary cleanup will proceed through the Registered Environmental Consultant Program or under direct oversight by the Branch Staff, as discussed below:

Agreement to Conduct Assessment and Remediation Through the Registered Environmental Consultant Program.

The Branch has a privatized oversight arm of the voluntary cleanup program known as the Registered Environmental Consultant ("REC") program. Under the REC program, the volunteer hires an environmental consulting firm, which the State has approved as having met certain qualifications, to implement a cleanup and certify that the work is being performed in compliance with regulations. In other words, the REC's certifications of compliance are in place of direct oversight by the Branch. Details of the REC program can be found at <http://portal.ncdenr.org/web/wm/sf/ih/recprogram>. If you have any questions specific to the REC Program, including how to participate, please contact the REC Program Manager, Kim Caulk, at (919) 508-8451.

Agreement to Conduct Assessment and Remediation Under State Oversight.

If the Branch determines that due to site conditions a site should be assessed and remediated pursuant to direct State oversight, it will not be eligible for a REC-directed cleanup. Rather, the remedial action will receive direct oversight by Branch staff.

IV. FAILURE TO RESPOND:

If we do not receive a response from you within the next 60 days indicating your willingness to enter an REC-AA, the Branch will take further action to prioritize the Site. Failure to take the initial abatement steps required in 15A NCAC 2L may result in the assessment of a civil penalty against you. In addition, the Branch may seek an injunction compelling compliance with the initial abatement steps required in


15A NCAC 2L. For future work beyond the initial abatement steps required pursuant to 15A NCAC 2L, a unilateral Order may be issued pursuant to § 130A-310.3 to compel assessment and cleanup. In addition, if you choose not to conduct a cleanup voluntarily, the site may be referred to the United States Environmental Protection Agency ("EPA"). If so referred, EPA will screen the site for Federal enforcement action under the Federal Superfund Program, established under the Comprehensive Environmental Responsibility, Compensation, and Liability Act ("CERCLA").

V. ADDITIONAL INFORMATION REGARDING THE IHSRA AND THE BRANCH:

People are often confused by the name of the Inactive Hazardous Sites Response Act and the Branch. By definition, "Inactive Hazardous Sites" are any areas where hazardous substances have come to be located and would include active and inactive facilities and a variety of property types. The term "inactive" simply refers to the fact that cleanup was inactive at large numbers of sites at the time of program enactment. Additional information about the Branch may be found at <http://portal.ncdenr.org/web/wm/sf/ihs/home>.

If you have additional questions about the requirements that apply to your site, please contact me at (910) 433-3345.

Sincerely,



P. Sean Boyles, L.G.
Inactive Hazardous Sites Branch
Superfund Section
225 Green Street, Suite 714
Fayetteville NC 28305

cc: Carl F. Bonner, PE, Terracon Consultants, Inc., 314 Beacon Drive, Winterville, NC 28590



North Carolina Department of Environment and Natural Resources

Beverly Eaves Perdue, Governor
Dee Freeman, Secretary

Division of Waste Management
Underground Storage Tank Section

Dexter R. Matthews, Director

TO: Charlotte Jesneck

FROM: Scott Bullock *JSB*

COPY: Bob Davies

DATE: September 29, 2011

RE: Referral of Tetrachloroethylene Groundwater Contamination
Sale Ford Facility
1145 US Highway 258 North, Kinston, NC
Lenoir County
UST Incident Number: 93123
Risk Classification: Undetermined
Ranking: Undetermined

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OCT 13 2011
DENR-FAYETTEVILLE REGIONAL OFFICE

The Washington Regional Office (WaRO) Underground Storage Tank (UST) Section received a Limited Site Investigation Report (Report) that included information for a petroleum release to soil and a release of tetrachloroethylene to groundwater. The UST Section is pursuing the petroleum release. However, the solvent tetrachloroethylene was detected above the 15A NCAC 2L .0202 Groundwater Standard. **Therefore, the UST Section is referring the tetrachloroethylene groundwater contamination to the Inactive Hazardous Waste Branch.** Please find attached a copy of the Reort.

If you have any questions or need additional information, please contact me at 252-948-3906.